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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware limited
liability company,

Plaintiff,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a/
TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS
PARENTEAU, an individual and citizen of the
State of Washington; HAPPY HOUR MEDIA
GROUP, LLC, a Washington limited liability
company; MITCHELL R. SUSSMAN &
ASSOCIATES, an individual and citizen of
the State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a
Washington professional services
corporation; and KEN B. PRIVETT, ESQ., a
citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO PLAINTIFF'S MOTION TO
OVERRULE SCHROETER,
GOLDMARK & BENDER, P.S.'
SPURIOUS PRIVILEGE AND WORK
PRODUCT OBJECTIONS AND
COMPEL DISCOVERY [ECF NO. 278]**

(First Stipulation)

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**STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO OVERRULE SCHROETER, GOLDMARK & BENDER,
P.S.' SPURIOUS PRIVILEGE AND WORK PRODUCT OBJECTIONS AND
COMPEL DISCOVERY [ECF NO. 278] (First Stipulation)**

Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK & BENDER, P.S. ("Defendant"), by and through their respective counsel, agree and stipulate as follows:

1. On August 11, 2020, Plaintiff filed Motion to Overrule Schroeter, Goldmark & Bender, P.S.' Spurious Privilege and Work Product Objections and Compel Discovery [ECF No. 278] ("Plaintiff's Motion to Compel Discovery").

2. The current deadline for Defendant to file response or opposition to Plaintiff's Motion to Compel Discovery is August 25, 2020.

3. The parties have agreed that Defendant's deadline to respond to Plaintiff's Motion to Compel Discovery shall be extended for additional ten (10) days, up to and including **Friday, September 4, 2020**.

4. Pursuant to Local Rule 6-1(b), the Parties state the reason for the extension is that Defendant's counsel requires more time to adequately address and brief the issues present in Plaintiff's Motion to Compel Discovery.

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5. The Parties have entered into this agreement in good faith and not for purposes of delay. This is the Parties' first stipulation for extension of this deadline. This request will not cause any prejudice to the parties in this matter.

Dated this 25th day of August, 2020.

Dated this 25th day of August, 2020.

GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

/s/ Michelle E. Durieux

/s/ Megan H. Hummel

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Attorneys for Plaintiffs

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

8-25-2020
DATED: _____

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